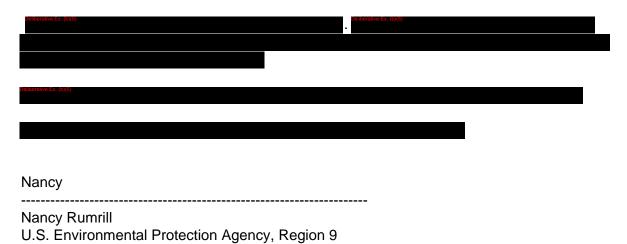
# **Document Log Item**

Addressing			
From		То	
Nancy Rumrill/R9/USEPA/US		Adam Freedman/R9/USEPA/US@EPA	
СС		BCC	
George Robin/R9/USEPA/US@	EPA		
Description			Form Used: Reply
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Re: Fw: CO2 Injection Well - State Primacy		09/09/2009 03:09 PM	
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## Body

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Ground Water Office, WTR-9 75 Hawthorne Street San Francisco, CA 94105 415-972-3293 415-947-3545 (FAX)

Adam Freedman---09/09/2009 02:31:12 PM---Nancy and George--

Deliberative Ex. (b)(5)

From: Adam Freedman/R9/USEPA/US

To: George Robin/R9/USEPA/US@EPA, Nancy Rumrill/R9/USEPA/US@EPA

Date: 09/09/2009 02:31 PM

Subject: Fw: CO2 Injection Well - State Primacy

### Nancy and George--



### -Adam

---- Forwarded by Adam Freedman/R9/USEPA/US on 09/09/2009 02:28 PM ----

From: "Chan, Victor M." < VMChan@SolanoCounty.com>

To: Adam Freedman/R9/USEPA/US@EPA

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Date: 09/09/2009 01:51 PM

Subject: CO2 Injection Well - State Primacy

#### Adam

We had a planning meeting on the CO2 Injection Well this morning. You should be aware that there may be some conditions with the Solano County's Use Permit.

One issue that came up during today's meeting is about jurisdiction and enforcement on this relatively new program.

According to the EPA homepage on state primacy located at: <a href="http://www.epa.gov/safewater/uic/primacy.html">http://www.epa.gov/safewater/uic/primacy.html</a> The State of California is a "joint primacy state" for the UIC program which need clarification. I also have the following questions for the US EPA:

- 1. Once you issue your EPA permit, who is responsible for enforcement of the EPA's permit conditions? (i.e. will EPA enforce the permit conditions or is enforcement delegated to California?)
- 2. Will your EPA permit invoke the "proposed" EPA requirements for Geological Sequestration of CO2 (EPA 816-F-08-032) that is now undergoing public review?
- 3. Can I get a DRAFT of your EPA permit? I would like to coordinate the EPA's requirements with the county requirements to ensure no conflict, avoid duplication and ensure completeness.

Victor M Chan, PE, BCEE
Solano County Civil / Environmental Engineer
Board Certified Environmental Engineer <a href="www.aaee.net">www.aaee.net</a>
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